

1 S T A T E M E N T

2 O. F

3 DONALD HULL

US EPA RECORDS CENTER REGION 5



COPY

5 IN RE: In the Matter of the Albion-Sheridan Township  
6 Landfill Site

7 BY: MR. KURT N. LINDLAND  
8 77 West Jackson Blvd.  
Chicago, Illinois 60604, appearing on behalf  
of the U.S. Environmental Protection Agency.

9 MR. CHARLES E. BARBIERI  
10 313 South Washington  
Lansing, Michigan 48933, appearing on behalf  
11 of the Deponent, Donald Hull.

12 REPORTED BY: ACRO COURT REPORTERS, INC.  
13 (Toni L. VanSyckle, Reporter)

14 At Albion City Hall, 112 Case Street, Albion  
15 Michigan, on Thursday, June 4, 1992 commencing at or about  
16 the hour of 2:05 p.m.

- 1 Q. Of what plant?
- 2 A. Longeran and Union Steel.
- 3 Q. What was the first one you mentioned?
- 4 A. Longeran.
- 5 Q. Could you spell that?
- 6 A. L-O-N-G-E-R-A-N.
- 7 Q. Are they still in business now?
- 8 A. No.
- 9 Q. Union Steel?
- 10 A. Yes.
- 11 Q. Any other companies?
- 12 A. Service Caster and Truck Company.
- 13 Q. Is that company still in business?
- 14 A. No.
- 15 Q. You mention that you would pick up batteries from, you
- 16 said --
- 17 A. Garages, yes.
- 18 Q. Garages around town.
- 19 Do you remember which garages?
- 20 A. Buicks, Plymouth, Chevrolet, Ford.
- 21 Q. Just all the car dealers in town?
- 22 A. Some gas stations.
- 23 Q. Okay. Later on I'll read off a list of some of those
- 24 gas stations and we'll talk a little bit more about
- 25 that then.

1 Q. When you became president of Blyveis, what exactly were  
2 you responsible for?

3 A. Instructing the workers, telling them what to do in the  
4 yard and in the way house, instructing them where to go  
5 to get the scrap on a particular day, and keeping in  
6 contact with all the person, agents that we would  
7 negotiate price for the month.

8 Q. So did you do the negotiating for the price for each  
9 month for the pick up?

10 A. Yes.

11 Q. And what companies did you service?

12 A. Union Steel, Service Caster, McGraw Edison.

13 Q. And McGraw Edison. When did you first start servicing  
14 McGraw Edison?

15 A. They were being serviced when I started working at  
16 Blyveis.

17 Q. Okay, now when you were a laborer, did you ever go to  
18 McGraw Edison and pick up any material?

19 A. Yes, I'd drive a truck up there, yes.

20 Q. And what kind of material would you pick up at McGraw  
21 Edison?

22 A. There would be call it skeletons of sheet metal half as  
23 big as this table and they'd press out and be pieces 20  
24 gauge, heavier than that. They'd put them in scrap  
25 containers and put them on a forklift, put them on the

1 Q. And you put those in the drums?

2 A. Yes.

3 Q. And then what would you do with the drums then?

4 A. We would take them in the Detroit area and sell the  
5 material and bring them back at least 12, 14 drums so  
6 we could keep on using them.

7 Q. Did you ever bring those drums out to the landfill?

8 A. No.

9 Q. You mention that there was some other industries that  
10 used the landfill.

11 Do you know specifically whether any industries  
12 brought materials in drums, 55 gallon drums?

13 A. No, I don't.

14 Q. What industries do you remember seeing using the  
15 landfill?

16 A. Union Steel, Corning Glass Works.

17 Q. Do you know what kind of material those two companies  
18 brought out there?

19 A. No.

20 Q. Do you know of anybody that would know what kind of  
21 material they brought there?

22 A. No, I don't.

23 Q. You mentioned that you would pick up batteries from  
24 companies in town, gas stations, service stations?

25 A. Yes.

1 MR. LINDLAND: Okay.

2 Q. (BY MR. LINDLAND) Do you know whether any other  
3 companies used the Albion-Sheridan Township Landfill in  
4 the Albion area here?

5 A. No, I don't.

6 Q. Do you know whether the Albion College used it?

7 A. Yes, they did.

8 Q. Do you know what kind of material they brought out  
9 there?

10 A. No. If I said same thing, paper, probably be close as  
11 anything.

12 Q. Okay. Do you remember seeing any Albion College trucks  
13 out there?

14 A. Yes, this was the type of material they had in it,  
15 that's the only thing I can remember about Albion  
16 College.

17 Q. General refuse kind of material?

18 A. Paper, office paper type stuff.

19 Q. Okay. You mentioned Union Steel?

20 A. Yes.

21 Q. What about Decker Manufacturing?

22 A. They may have taken stuff out there.

23 Q. But you don't know for sure, you never saw any trucks  
24 out there?

25 A. No.

- 1 A. Not really.
- 2 Q. Do you know --
- 3 A. Not many. I wouldn't know but one or two, I guess.
- 4 Q. Do you know whether their use of the landfill was
- 5 fairly consistent or were there breaks?
- 6 A. I don't know.
- 7 Q. Do you remember any other industries using the
- 8 Albion-Sheridan Township Landfill?
- 9 A. No.
- 10 Q. Earlier you mentioned that you had talked to somebody
- 11 from our offices regarding this same matter, do you
- 12 remember that conversation?
- 13 A. Not too much, no.
- 14 Q. Do you remember mentioning that Union Steel used that
- 15 landfill to the other employee of EPA that you talked
- 16 to earlier?
- 17 A. (Witness nodding head.)
- 18 Q. Do you remember whether Union Steel used their own
- 19 trucks?
- 20 A. They did, yes.
- 21 Q. What kind of trucks did they use?
- 22 A. I believe they were state trucks.
- 23 Q. State trucks?
- 24 A. State trucks.
- 25 Q. About how many, do you remember?

1 A. No, I don't.

2 Q. Did they have their name on the side?

3 A. Yes.

4 Q. Do you know what kind of material they disposed of out  
5 at the site?

6 A. I don't recall.

7 Q. Do you remember seeing any drums of material on a state  
8 truck from Union Steel out at the landfill?

9 A. No, I don't.

10 Q. Do you remember -- strike that.

11 You indicated earlier that you saw approximately  
12 20 drums out at the landfill, right?

13 A. Yes.

14 Q. Do you remember seeing those drums or any drums on a  
15 state truck out at the landfill?

16 A. No.

17 Q. On any truck?

18 A. No.

19 Q. I've got probably another half hour. Do you want to  
20 just keep going?

21 A. That's fine.

22 Q. Or take a break?

23 A. That's fine.

24 Q. You mentioned earlier in response to my question about  
25 contractors that use the Albion-Sheridan Township

1 Q. Would they place it in containers?

2 A. No.

3 Q. So, they would just discharge it?

4 A. Dump it right in the pond.

5 Q. How did the waste come to the pond? Was it in a truck,  
6 or was it in barrels?

7 A. In trucks.

8 Q. Do you recall what kind of a truck, or what company's  
9 truck it was?

10 A. No, I don't. Oh, I'm not sure. But, I think that the  
11 Union Steel had their own truck, tank truck, and they  
12 would bring liquids to the site?

13 A. They would bring cleaning fluids, and things like that.

14 Q. And they would discharge it into the pond?

15 A. Yes.

16 Q. And they came while you were working on duty?

17 A. Yes.

18 Q. And you told them to go and dump it into the pond?

19 A. That's what I dug the pond for.

20 Q. So, you dug out the pond?

21 A. Yes.

22 Q. And, do you recall another company coming to the pond?

23 A. Yes. There was 2 or 3 other companies. But, Stevick  
24 took care of that, and they would come from the north  
25 end. They didn't come up through the south end, where



- 1 Q. Do you recall if they ever came to the landfill?
- 2 A. I think they did. But, I think all they brought was  
3 just ordinary rubbish.
- 4 Q. And, you dealt with them? You directed where they  
5 should place the waste?
- 6 A. Well, they just came up and dumped at the edge of where  
7 we was dumping.
- 8 Q. And you told them to place it there, or they drove up  
9 without your instruction?
- 10 A. I didn't -- after I was there a while, why, I didn't  
11 have to tell them where to dump very many of them.  
12 Because, they would come in, and back up there, and  
13 dump, and take off.
- 14 Q. So, how frequently would they come to the landfill?
- 15 A. Oh, probably once a week, or something like that. I  
16 don't remember. So many came in there that I can't  
17 remember just who they was, or how often they come.
- 18 Q. Uh-huh. You have any recollection of any other sort of  
19 waste they might have brought?
- 20 A. No, I don't, just ordinary run of the rubbish.
- 21 Q. Do you recall a company called Steel Pattern and  
22 Manufacturing?
- 23 A. No, I don't.
- 24 Q. Do you recall a company named Union Steel?
- 25 A. Yes.

1 Q. What type of products did they manufacture?

2 A. They just brought out the sand that they used for -- in  
3 their forms, and things like that, and some wooden  
4 forms.

5 Q. Do you recall them ever bringing sludges out?

6 A. No, I don't recall them ever bringing any out.

7 Q. Do you know if Mr. Stevick ever dealt with Union Steel?

8 A. I don't know who he dealt with.

9 Q. Did you ever --

10 A. I never paid any attention to it, getting in his  
11 business.

12 Q. Do you ever recall a letter from a Mr. Harvey that  
13 talked about Union Steel bringing sludges to the  
14 landfill?

15 A. No, I don't.

16 Q. It discussed certain types of sludges with a toothpaste  
17 like consistency, that they were disposing of at the  
18 landfill. You don't recall any such letter?

19 A. No.

20 Q. Mr. Stevick never showed you any such letter?

21 A. No.

22 Q. And you have no recollection of any sludges coming to  
23 the landfill?

24 A. No, not -- only sludge that I can remember is where  
25 they come in with a tank truck, and dumped into the

1 pond.

2 Q. And, whose tank truck was that?

3 A. Well, Shelar's, for one, and I don't remember who --  
4 just who all did come up there: wasn't very many.

5 Q. Shelar brought sludge to the landfill?

6 A. Some.

7 Q. And then also brought liquids?

8 A. Very little liquids. Mostly what they brought was that  
9 kind of cleaning fluid, and stuff like that, that I  
10 remember.

11 Q. What color was the cleaning fluid?

12 A. Kind of a cream colored.

13 Q. And, do you recall what the cleaning fluid was used  
14 for?

15 A. No, I don't.

16 Q. Or where it came from?

17 A. No.

18 Q. They never had you sign any forms, or records?

19 A. No.

20 Q. So, did it smell, or did it have any sort of unique  
21 characteristic?

22 A. Up there at the dump, there's a smell there all the  
23 time.

24 Q. But, you don't recall this cream colored material  
25 smelling?

- 1 A. No.
- 2 Q. And that went into the pond?
- 3 A. Most of the time.
- 4 Q. But, sometimes it went on the rubbish pile?
- 5 A. Unless they brought it in a barrel or something like
- 6 that, and then they dumped it in the dump.
- 7 Q. So, they brought waste in barrels?
- 8 A. Yes.
- 9 Q. And did they leave the barrels there?
- 10 A. No, they dump it, and take the barrels back.
- 11 Q. And, then they come back and dump some more?
- 12 A. Sometimes, yes.
- 13 Q. Do you recall how frequently they came to the landfill?
- 14 A. Not too often. I don't remember exactly.
- 15 Q. Was it more frequent that they would come with a truck,
- 16 than with barrels, or could you really say?
- 17 A. I couldn't say.
- 18 Q. But, you saw them come with both the truck, and
- 19 barrels?
- 20 A. Yes.
- 21 Q. Do you recall a company named McGraw-Edison?
- 22 A. Oh, yes.
- 23 Q. And what kind of business is that?
- 24 A. Well, that was just about like them other ones. They
- 25 made forms for -- to make things out of, and things

1 A. No, I don't know how much it was. When the dump truck  
2 got full, it went out and dumped it.

3 Q. Do you remember how many dump trucks would go out there  
4 each week?

5 A. A week? I doubt if there was over a dump truck a week.

6 Q. So less than one a week, maybe one every two weeks?

7 A. Something like that, and I won't -- I can't swear to  
8 that.

9 Q. Was the use of the Albion-Sheridan Township Landfill  
10 for dumping lime, was that used consistent or were  
11 there -- and by that I mean were there breaks in the  
12 use of that landfill, for example, did Corning bring  
13 lime to another landfill for awhile?

14 A. No, all of Corning's material went to the Sheridan  
15 Township Landfill.

16 Q. Are you familiar with a landfill known as Copix  
17 Landfill?

18 A. Never heard of it.

19 Q. Okay. Do you know of any other companies or users of  
20 the landfill?

21 A. Sure, all the companies in town used it: Union Steel,  
22 McGraw Edison, Brooks Foundry, Albion Malable; it's  
23 Hayes Albion now or it was, it's Harvard Industries  
24 now.

25 Q. Harvard.

1 and drive off.

2 Q So you never really looked at it?

3 A Never looked at it.

4 Q And so that people never really discussed the other  
5 types of waste?

6 A No.

7 Q How many other trucks would you see at the landfill,  
8 besides Corning?

9 A I don't know. Corning is the only one I can think of  
10 right now.

11 Q But you did recall seeing Corning about the same  
12 frequency that you were out there, and perhaps even  
13 more?

14 A More times than I was.

15 Q Did Whitey Hall ever have any of his drivers take  
16 materials from Corning to the dump?

17 A No.

18 Q Did Corning ever haul to any of the other dumps  
19 that you know of?

20 A Not that I know of. Just the one on State Street, that  
21 one there.

22 Q Do you recall a business named Union Steel?

23 A Yep.

24 Q What type of business were they in?

25 A Wire racks, bakery shelf racks.

- 1 Q Do you know where they took their waste products to, any  
2 garbage?
- 3 A No.
- 4 Q You never hauled for them?
- 5 A They took it the same place, yes.
- 6 Q They took it to the dump on Erie?
- 7 A Yes.
- 8 Q And they would dump in the same hole that everybody else  
9 dumped?
- 10 A Same hole, yes.
- 11 Q But you don't recall any sort of peculiar type of waste  
12 that they might have had, anything distinguishing?
- 13 A No.
- 14 Q They just backed the truck up --
- 15 A Backed up.
- 16 Q -- and dumped it out?
- 17 A Dumped it out.
- 18 Q Did anyone ever have anything unusual in the form of a  
19 truck, other than a dump truck, like a tank truck?
- 20 Did you ever see a tank truck --
- 21 A Not that I know of.
- 22 Q -- or anything else?
- 23 A I never seen one.
- 24 Q So you just saw regular old dump trucks?
- 25 A Yes.